

1 The Honorable Ricardo S. Martinez  
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UNITED STATES DISTRICT COURT

5 WESTERN DISTRICT OF WASHINGTON

6 AT SEATTLE

8 TREVOR KEVIN BAYLIS,

9 Plaintiff,

10 v.

11 VALVE CORPORATION,

12 Defendant.

Case No. 2:23-cv-01653-RSM

**PLAINTIFF**

**TREVOR KEVIN BAYLIS**

**REPLY IN SUPPORT OF REQUEST  
FOR JUDICIAL NOTICE UNDER  
RULE 201**

13 Filed: 22th March 2024

14 **1. INTRODUCTION**

15 In their RESPONSE by Defendant Valve Corporation re32 Notice-Other to  
16 Request for Judicial Notice Pursuant to ER 201(e) (Dkt. #34) (“Objection”) Valve ask the  
17 court to be given the opportunity to be heard on the propriety of taking judicial notice and the  
18 nature of the facts to be noticed.

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20 **2. ARGUMENT**

21 **A. Iron Sky Film was first published in Germany at the Berlin Film  
22 Festival on 11th February 2012 and this cannot be reasonably disputed.**

23 Under Rule 201, facts appropriate for judicial notice are those that are (1)  
24 “not subject to reasonable dispute” in that they (2) are “capable of accurate and ready

1 determination by resort to sources whose accuracy cannot be reasonably questioned.”

2 Federal rules of evidence 201(b).

3 Valve’s Objection cannot be sustained because the sources provided in the

4 Baylis’ Judicial notice are sources whose accuracy cannot be reasonably questioned.

5 Additionally, a judge is unrestricted in researching facts for themselves and whilst

6 Baylis has provided four sources of information relating to the first publication of Iron

7 Sky in Germany at the Berlin Film Festival on 11th February 2012, there are many more

8 sources available which a judge can, by their own discretion seek out, and the unquestionable

9 fact remains that Iron Sky was first published in Germany at the Berlin Film Festival on 11th

10 February 2012, and there is no impropriety for the court in noticing such things as they are

11 facts that relate to the case at hand and not subject to reasonable dispute.

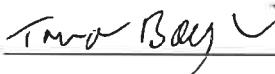
12 **3. CONCLUSION**

13 This Reply is respectively made in support of Plaintiff’s in Support of Request for  
14 Judicial Notice under rule 201, Dkt. 32.

16 I hereby certify that, to the best of my knowledge, the provided information is true and accurate.

17 22nd March 2024

19 Trevor Kevin Baylis

20 

22 Jankanraitti

23 Tampere 33560, FINLAND

**CERTIFICATE OF SERVICE FORM  
FOR ELECTRONIC FILINGS**

I hereby certify that on 22 March 2024 I electronically filed the foregoing document

with the United States District Court

Western District of Washington at Seattle by using the

CM/ECF system. I certify that the following parties or their counsel of record are registered as ECF Filers and that they will be served by the

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Dated: 22nd March 2024

Tina Baylin

Trevor Kevin Baylis

Jankanraitti

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